

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION)	MDL 2804
)	
OPIATE LITIGATION)	Case No.: 1:17-md-2804
)	
THIS DOCUMENT RELATES TO:)	Judge Dan Aaron Polster
)	
<i>ALL CASES</i>)	
)	
_____)	

SUPPLEMENTAL DECLARATION OF CAMERON R. AZARI

I, CAMERON R. AZARI hereby declare and state as follows, pursuant to 28 U.S.C. § 1746:

1. My name is Cameron R. Azari. I am over the age of twenty-one. Unless otherwise indicated below, I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.

2. I am the Director of Legal Notice for Hilsoft Notifications (“Hilsoft”), a firm that specializes in designing, developing, analyzing and implementing large-scale, un-biased, legal notification plans. Hilsoft is a business unit of Epiq Class Action & Claims Solutions, Inc. (“Epiq”).

3. On December 2, 2019 the parties filed my *Declaration of Cameron R. Azari, ESQ. on Implementation and Adequacy of Notices and Notice Plan* (“Notice Declaration”). In the Notice Declaration, I described the efforts undertaken to identify contact information for the members of the Negotiation Class and reported on the mailed and emailed notice effort,

including the plain language design of the notices. Additionally I reported on the notice administration statistics, including website and toll-free volumes and the number of exclusion requests that were received and processed as of the date of my signature. I make this Supplemental Declaration to provide updated information concerning the exclusion requests received.

4. The facts in this declaration are based on what I personally know, as well as information provided to me in the ordinary course of my business by my colleagues at Hilsoft and Epiq who worked to implement the notification effort.

Exclusion Requests

5. The exclusion request deadline was November 22, 2019. My Notice Declaration reported that, as of November 27, 2019, Epiq had received 580 requests for exclusion. After a further, detailed audit of both mail and email submissions, Epiq identified additional entities that submitted exclusion requests as of the November 22 deadline. A small number of additional exclusion requests were received after the November 22 deadline. Working with Negotiation Class Counsel, Epiq also confirmed that some of the exclusion requests were sent by entities that were not part of the Negotiation Class membership listed on the class website.

6. Based on our records and audits, Epiq received a total of 569 requests for exclusion on or before the November 22, 2019 deadline from valid class members. Of those, 18 subsequently requested in writing to rescind their exclusion requests and remain in the Negotiation Class, leaving 551 timely, unrescinded requests for exclusion.

7. Epiq also received 5 exclusion requests after the November 22, 2019 deadline. None of those entities have requested to rescind their exclusion requests.

8. Attached as Exhibit A is a chart identifying the 33,884 Negotiation Class members that never requested exclusion from the Negotiation Class.

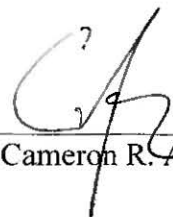
9. Attached as Exhibit B is a chart identifying the 18 members that rescinded their exclusion requests.

10. Attached as Exhibit C is a chart identifying the 551 members that submitted exclusion requests as of the November 22, 2019 deadline and did not ask to rescind their exclusion request.

11. Attached as Exhibit D is a chart identifying the 5 members that submitted exclusion requests after the November 22, 2019 deadline.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 10, 2020.


Cameron R. Azari